

**DISCLOSURE OF ADDITIONAL ATTORNEY'S FEE AND FEE AGREEMENT**

The Debtor(s) and Jane H. Downey have agreed that certain fees are not included in the flat fee of \$3,500 for individuals or \$4,000 for primarily business debtors in Chapter 13 cases. Such fees arising during a Chapter 13 Bankruptcy for the United States Bankruptcy Court, the District of South Carolina are set forth as follows:

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Draft, file and Serve an Objection to Motion, including those to dismiss and Relief from Stay or Co-Debtor Stay	Amount \$600
Motion to Reinstate Automatic Stay or resumption of payment	Amount:\$600
Pre-Confirmation Plan Amendment	Amount:600
Post-Confirmation Plan Amendment	Amount:\$600
Motion for Substitution of Collateral	Amount:\$600
Motion to Incur Debt	Amount:\$600
Motion to Sell Property	Amount:\$600
File Proof of Claim	Amount:\$300
Objection to Creditor's Proof of Claim	Amount:\$600
Motion for Moratorium	Amount: \$600
Amendment to Schedules and Statements after first amendment	Amount: \$600
Application for Settlement	Amount: \$600
Consent Order Approving Loan Modification	Amount: \$600
Consent Order Lifting the Stay	Amount: \$600
Representation in Adversary Action or Contested Matter	Amount: \$420/hr
Negotiation with Creditors or Parties in Interest	Amount: \$420/hr
Appearance at Continued Hearing	Amount: \$300
Travel to/from Spartanburg and Charleston	Amount: \$900
Motion (general)	Amount: \$600
Correspondence	Amount \$600
Loan Modification / Portal	Amount \$1,500 or more
Loan Modification Appeal / Mediation	Amount \$600

I understand and agree these fees are in addition to the \$3,500 or \$4,000 in expedited attorney's fees I agree to pay for filing the case and I agree to pay these additional fees directly or through a claim my attorney may file in my bankruptcy case.

  
Client

\_\_\_\_\_  
Date

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA

IN RE:

Jonathan K. Smith

DEBTOR(S)

CASE NO: 20-01278-jw

CHAPTER 13

**CERTIFICATE OF SERVICE AND NOTICE OF SUPPLEMENTAL FEES**

Take notice that the undersigned has filed a Statement of Supplemental Fees pursuant to SC LBR 2016-1(b)(2) as follows:

Supplemental Fees in this Request: \$15,520.00

Statement of Work: Defend and settle objections to plan from CPCM, SLS and the Chapter 13 Trustee, defend and settle objection to 362 motion with CPCM, draft motion to value tax claims and speak with IRS re same, draft and edit multiple joint statements of dispute, prepare for and attend 362, confirmation and status hearings, amend chapter 13 plan, draft and attend hearing on motion to incur debt and emergency hearing motion, negotiate lien release with 2 creditors, amend schedules, many emails and phone calls with client, assist debtor in financing efforts.

These fees are added to any prior amounts charged.

Unless an objection to the Statement is filed within fourteen (14) days of service or unless the Court orders otherwise, the supplemental fee shall be approved for disbursement subject to the terms of the confirmed plan and SC LBR 2016-1.

All supplemental fees approved for disbursement remain subject to the Court's consideration of the fee under 11 U.S.C. § 329(b) at any time prior to the closing of the case.

MAILING ADDRESS FOR OBJECTIONS: 1100 Laurel Street, Columbia, SC 29201.

I hereby certify that notice of the Statement of Supplemental Fees was served on the chapter 13 trustee by electronic transmission (NEF) and a copy of this document was served on debtor(s) on this date as follows:

Jonathan K. Smith  
2670 Sumter Hwy  
Bishopville, SC 29010



Date: October 22, 2020

/s/ Jane H. Downey  
Jane H. Downey, ID #5242  
Moore Taylor Law Firm, P.A.  
1700 Sunset Blvd.  
West Columbia, SC 29169  
803-454-1983  
Jane@mttlaw.com